

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re Terrie Cozart,
Debtors

Chapter 13

Terrie Cozart,
Movant

Case No. 5:14-BK-05172-JJT

v.

Lackawanna County Tax Claim
Bureau,
Respondent

DEBTOR'S OBJECTION TO RESPONDENT'S PROOF OF CLAIM (# 3)

Debtor, by counsel, objects to Proof of Claim #3 filed by Lackawanna County Tax Claim Bureau (Lackawanna County Tax Claim Bureau) in the amount of \$372.08 and assigns the following reasons for same:

1. Debtor does not owe any money to the Lackawanna County Tax Claim Bureau, and Respondent's claim should be disallowed in its entirety.
2. As the claim itself indicates, the debt is owed by the Debtor's daughter, Terra Cozart.
3. Creditor classified the claim as secured. This classification is correct, however as stated above, the Debtor does not owe this claim.

WHEREFORE, Debtor respectfully requests that this Honorable Court disallow the proof of claim filed by Lackawanna County Tax Claim Bureau, and order such other and further relief as is just and proper.

Date: March 3, 2015

/s/ Carlo Sabatini
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